

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Alto Maipo Delaware LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 21-11507 (KBO)
)
) (Jointly Administered)
)
) **Ref. Docket Nos.**
) **Hearing Date: April 5, 2022 at 10:00 a.m. (ET)**
) **Objection Deadline: March 29, 2022 at 4:00 p.m. (ET)**
)

**NOTICE OF HEARING TO CONSIDER
APPROVAL OF DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE THAT the, on February 28, 2022, the above-captioned debtors and debtors in possession (the “Debtors”) filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) the *Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 314] (as may be subsequently amended, modified, or supplemented, the “Plan”), and on March 1, 2022, the Debtors filed the *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 313] (as may be subsequently amended, modified, or supplemented, the “Disclosure Statement”).

PLEASE TAKE FURTHER NOTICE THAT the Debtor intends to present the Disclosure Statement for approval at a hearing before the Honorable Karen B. Owens on **April 5, 2022 at 10:00 a.m. (ET)** convened at the Bankruptcy Court, 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 (the “Disclosure Statement Hearing”). The Disclosure Statement may be amended, modified, or supplemented at any time prior to or at the Disclosure Statement Hearing, and the Disclosure Statement Hearing may be adjourned from time to time without further notice, except for the announcement of the adjourned date(s) through the agenda for the Disclosure Statement Hearing and/or at the Disclosure Statement Hearing or any continued hearing(s). For the avoidance of doubt, the Disclosure Statement Hearing may be conducted telephonically or by Zoom.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the approval of the Disclosure Statement must: (a) be in writing; (b) state the name, address, and nature of the Claim or Interest of the objecting or responding party proposing a modification to the Disclosure Statement; (c) state with particularity the legal and factual basis and nature of any objection and

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

set forth the proposed modification to the Disclosure Statement, together with suggested language; (d) be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, together with proof of service, **on or before March 29, 2022 at 4:00 p.m. (ET)** (the “**Objection Deadline**”); and (e) be served upon the following parties so as to be received on or before the Objection Deadline: (i) Counsel to the Debtors, (x) Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006, Attn: Richard J. Cooper, Luke A. Barefoot, and Jack Massey (email: rcooper@cgsh.com, lbarefoot@cgsh.com, and jamassey@cgsh.com) and (y) Young Conaway Stargatt & Taylor LLP, 1000 N. King Street, Wilmington, DE 19801 Attn: Pauline K. Morgan, Sean T. Greecher and S. Alexander Faris (email: pmorgan@ycst.com; sgreecher@ycst.com, and afaris@ycst.com); (ii) The United States Trustee, 844 King Street, Suite 2207, Wilmington, Delaware, 19801, Attn: Jane Leamy (email: jane.m.leafy@usdoj.gov); and (iii) Proposed Counsel to the official committee of unsecured creditors, Benesch, Friedlander, Coplan & Aronoff LLP, 1313 North Market Street, Suite 1201, Wilmington, DE, 19801, Attn: Jennifer R. Hoover and Kevin M. Capuzzi (jhoover@beneschlaw.com and kcapuzzi@beneschlaw.com) and Dentons US LLP, 1900 K Street, NW, Washington, DC 20006, Attn: Sam J. Alberts and Lynn P. Harrison III (sam.alberts@dentons.com and lynn.harrisoniii@dentons.com).

PLEASE TAKE FURTHER NOTICE THAT only those objections made in writing and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court during the Disclosure Statement Hearing. If no objections to the Disclosure Statement are timely and properly filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order approving the Disclosure Statement without further notice.

PLEASE TAKE FURTHER NOTICE THAT copies of the Plan and the Disclosure Statement are available for inspection during regular business hours, excluding federal holidays, at the office of the Clerk of the Bankruptcy Court, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801. In addition, copies of the Plan and the Disclosure Statement may be obtained: (i) by visiting the dedicated webpage related to the Debtor’s chapter 11 case, <https://cases.primeclerk.com/altomaipo/> (ii) upon written request via first class mail to the Debtor’s voting agent, Prime Clerk, LLC (the “**Voting Agent**”), at Alto Maipo SpA Ballot Processing, c/o Prime Clerk LLC, 850 Third Avenue, Suite 412, Brooklyn, New York 11232 or (iii) for a fee, from the Bankruptcy Court’s website, www.deb.uscourts.gov (a PACER account is required). A PACER login and password can be obtained through the PACER Service Center at <https://www.pacer.gov>.

PLEASE TAKE FURTHER NOTICE THAT THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN WILL BE SOLICITED IF AND WHEN THE BANKRUPTCY COURT APPROVES THE DISCLOSURE STATEMENT.

NO PERSON, INCLUDING THE VOTING AGENT, HAS BEEN AUTHORIZED TO GIVE ANY INFORMATION OR ADVICE, INCLUDING LEGAL ADVICE, OR TO MAKE ANY REPRESENTATION, REGARDING THE DEBTOR OR THE PLAN.

Dated: March 1, 2022
Wilmington, Delaware

/s/ Sean T. Greecher

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